AT&T Agreement, § 10.16.1, Sch. 9.2.6(3.0). Ameritech Michigan provides billing data for resale services through the Ameritech Electronic Billing System ("AEBS"), a system developed by Ameritech and used by resellers, including MFS, to bill for local and resold service. Ameritech Michigan uses this system for resale billing because billing to resellers is essentially the same as the retail billing for which AEBS was designed and, therefore, best meet the equal-in-quality standard. Ameritech Michigan provides billing data for unbundled network elements in the Carrier Access Billing System ("CABS") format. Ameritech chose CABS because it was designed and used for billing for access charges, which, like unbundled elements, involves billing services to other carriers, not simply retail customers and resellers.

70. In all cases, Ameritech Michigan provides requesting telecommunications carriers with access to OSS functions used for pre-ordering, ordering, provisioning, maintenance and repair, and billing processes on the same basis that it provides them to itself and its affiliates. Where Ameritech Michigan's customer contact employees use a manual process to input data or obtain data from a particular system, a comparable manual interface for access will be provided to requesting telecommunications carriers. Where Ameritech Michigan's customer contact employees use electronic interfaces to access OSS functions, equivalent interfaces

will be provided to requesting telecommunications carriers where technically feasible. In addition, the quality of access adheres to existing national protocols and standards wherever such protocols and standards exist and are adopted by the industry. See, e.g., AT&T Agreement, §§ 10.13.2(a), 10.13.3(a).

III. CHECKLIST ITEM (iii): ACCESS TO RIGHTS-OF-WAY

71. Section 271(c)(2)(B)(iii) requires Ameritech Michigan to provide "[n]ondiscriminatory access to [its] poles, ducts, conduits, and rights-of-way . . . at just and reasonable rates in accordance with the requirements of Section 224." Ameritech Michigan makes its poles, ducts, conduits, and right-of-way ("Structure") available for the placement of requesting telecommunications carriers' wires, cables, and related facilities, to the extent it may lawfully do so. See, e.g., AT&T Agreement, Art. XVI. Ameritech Michigan's offering satisfies Sections 271 and 224 by not favoring Ameritech Michigan or its subsidiaries or affiliates over requesting telecommunications carriers or any other third party. The specifics of Ameritech Michigan's offering in this area are discussed by Mr. Mayer.

72. Ameritech Michigan is currently furnishing MFS and Brooks Fiber with access to Ameritech Michigan's poles, ducts, conduits, and rights-of-way.

IV. CHECKLIST ITEM (iv): LOCAL LOOP TRANSMISSION

73. Ameritech Michigan provides "local loop transmission from the central office to the customer's premises, unbundled from local switching or other services," as required by the Act. § 271(c)(2)(b)(iv). An unbundled loop is a transmission path between a distribution frame, or its equivalent, in an Ameritech Michigan central office, and the network interface device at the customer premises. See, e.g., AT&T Agreement, Sch. 9.2.1. This definition complies with the definition in the Rules. 47 C.F.R. § 51.319(a).

74. Ameritech Michigan makes available to a requesting telecommunications carrier the range of standard unbundled loops, including 2-wire and 4-wire loops supporting analog, ISDN, ADSL, HDSL, and 1.544 Mbps digital (DS1) transmission. Order, ¶ 380. See, e.g., AT&T Agreement, Sch. 9.2.1. Ameritech Michigan offers to provide access to its unbundled loops at each of Ameritech Michigan's wire centers via collocation and a cross-connect, and will respond to requests for access at other points through the BFR Process. See, e.g., AT&T Agreement, Sch. 9.5(2.1). Ameritech Michigan also provides unbundled access to loops served by Integrated Digital Loop Carrier ("IDLC") or Remote Switching deployed as a loop concentrator through the BFR Process. See, e.g., AT&T Agreement, Sch. 9.5(2.1.2).

75. Ameritech Michigan's offering satisfies the FCC's Rules by providing unbundled access to all basic loop types. The Rules do not require any further unbundling of local loop transmission as a core offering, except for offering access to the NID which I previously discussed. However, Ameritech Michigan will consider specific requests for unbundling of other loop types and subloop elements through the BFR Process and will provide unbundled access where technically feasible.

76. Ameritech Michigan is currently furnishing unbundled local loop transmission to both Brooks Fiber and MFS.

V. CHECKLIST ITEM (v): LOCAL TRANSPORT

77. The FCC has ordered incumbent LECs to unbundle local transport, also called interoffice transmission facilities, that are dedicated to a particular customer or carrier or shared by more than one customer or carrier. 47 C.F.R. § 51.319(d); 47 U.S.C. § 271(c)(2)(B)(v). These are facilities that provide telecommunications between wire centers or switches owned by incumbent LECs or requesting telecommunications carriers. 47 C.F.R. § 51.319(d)(1). Ameritech Michigan provides access to both types of interoffice facilities through its interconnection agreements, and provides them on the trunk side of the switch unbundled from switching or other services. 47 U.S.C. § 271(c)(2)(B)(v).

78. Specifically, Ameritech Michigan offers access to unbundled dedicated interoffice transport and entrance facilities, and shared transport and entrance facilities as described in Schedule 9.2.4 of the AT&T Agreement. While dedicated transport involves a circuit dedicated to a certain requesting carrier, shared transport is an arrangement where two or more requesting carriers share the features, functions, and capabilities of a transmission facility, along with the cost. See, e.g., AT&T Agreement, Sch. 9.2.4. The actual price paid by each carrier sharing the facility depends on the number of carriers sharing the facility, and the respective billing percentage designated to each of the carriers. Ameritech Michigan will consider requests to provide unbundled access to other interoffice transmission facilities through the BFR process. See, e.g., AT&T Agreement, Sch. 9.2.4(4.10).

79. Ameritech Michigan's unbundled local transport offering fully complies with the Act and Rules by allowing access to both dedicated and shared transport, including all technically feasible transmission facilities, features, functions, and capabilities that a requesting carrier could use to provide a telecommunications service. 47 C.F.R. § 51.319(d)(2)(ii). See, e.g., AT&T Agreement, Sch., 9.2.4(5.2). Requesting telecommunications carriers are permitted, to the extent technically feasible, to connect to such interoffice transport network element facilities to equipment designated

by the requesting carrier, including the requesting telecommunications carrier's collocation equipment. 47 C.F.R. § 51.319(d)(2)(iii). See, e.g., AT&T Agreement, Sch. 9.5(5.3). The unbundled interoffice transport network element also offers unbundled access to digital cross-connect systems in the same manner that Ameritech Michigan provides that functionality to IXCs. 47 C.F.R. §51.319(d)(2)(iv). See, e.g., AT&T Agreement, Sch. 9.5(5.4).

VI. CHECKLIST ITEM (vi): LOCAL SWITCHING

80. The FCC (47 C.F.R. § 51.319(c)) and the Act (§ 271(c)(2)(B)(vi)) require incumbent LECs to unbundle local switching from transport, local loop transmission, or other services. The Rules also require unbundling of tandem switching capability, including trunk-connect facilities, the basic switching function of connecting trunks to trunks, and the functions centralized in tandem switches as opposed to end office switches. 47 C.F.R. § 51.319(c)(2). Ameritech Michigan's interconnection agreements satisfy these requirements.

81. **Local Switching**. As required by § 51.319(c)(1)(i), (ii) of the FCC's Rules, Ameritech Michigan is offering requesting telecommunications carriers access to Ameritech Michigan's unbundled local switching through line-side and trunk-side ports, including all features, functions, and capabilities available in the switch for the port type requested on a line

by line basis. See, e.g., AT&T Agreement, Sch. 9.2.3(1.0). Additional technically feasible unbundled switching functions, features and capabilities, and custom and special routing are made available through the BFR Process.

82. As Section 271 requires, Ameritech Michigan offers local switching unbundled from transport, local loop transmission, and other services. The requesting telecommunications carrier will subscribe to or provide sufficient local loops, transport and other services or facilities to handle traffic to and from the unbundled line side and trunk side ports to which it subscribes. The requesting carrier will receive electronic access to activate or deactivate switching capabilities, functions and features of the switch as a single element on a per-line basis.

83. Access to unbundled local switching is offered through line-side ports, which include, but are not limited to, a connection between an unbundled loop or transport provided by the requesting carrier and a switch line card provided by Ameritech Michigan. Standard line-side ports types available to a requesting telecommunications carrier include:

- Basic Port;
- Ground Start Port;
- COPTS-Coin Port;
- ISDN Direct Port;
- Centrex Attendant Port;
- Centrex EKL Port; and
- Centrex ISDN Direct Port

Access to unbundled local switching is also offered through standard DS-1 trunk-side ports, which include the trunk termination at a trunk-side frame and a switch trunk card. Available trunk-side ports include:

- Direct Inward Dialing ("DID") Trunk Port;
- ISDN Prime Trunk Port;
- Digital Trunking Port; and
- Custom Routing Trunk Port.

Calls to another trunk-side port through unbundled local switching will be transmitted to that port, if requested, to the fullest extent of the switch's technical capabilities, based upon the requesting telecommunications carrier's agreement to pay the applicable recurring and nonrecurring costs of developing, providing and maintaining the function. On an optional basis, requesting telecommunications carriers can request additional or different port types through the BFR Process.

84. The unbundled local switching network element includes the standard switching functions of connecting lines to lines, lines to trunks, trunks to lines, and trunks to trunks. 47 C.F.R. §51.319(c)(1)(i)(C)(1). See, e.g., AT&T Agreement, Sch. 9.2.3(1.0). As required, the unbundled switching network element offers, on a standard basis, electronic access to all capabilities, functions and features of the switch available to Ameritech Michigan's customers from that switch for the type of port connection involved (See, e.g., AT&T Agreement, Sch. 9.5(4.1.2), including:

- dial tone;
- a telephone number;
- one white pages directory listing;
- standard line class code local routing and signaling;
- access to 911;
- access to Ameritech Michigan's operator services; and
- access to Ameritech Michigan's directory assistance.

85. A requesting telecommunications carrier purchasing unbundled local switching also obtains access to switching capabilities and features of the switch in a single element on a per-line basis, and the ability to deploy vertical individual features via an electronic ordering interface on a per-line basis. Unbundled local switching includes, on a standard basis, access to all vertical features, functions and capabilities of the switch that Ameritech Michigan is offering to its end user customers, such as custom calling, CLASS, and Centrex features to the port type involved. 47 C.F.R. § 51.319(c)(1)(i)(C)(2). See, e.g., AT&T Agreement, Sch. 9.5(4.1.3). For example, some of the features that may be activated with basic, ground start, and COPTS-Coin line side ports include, as applicable and where available:

- Call Waiting
- Call Forwarding — Variable
- Three-way Calling
- Automatic Callback
- Repeat Dialing
- Call Screening
- Caller I.D.
- Caller I.D. With Name
- Busy Line Transfer
- Busy Line Transfer/With Custom Control Option
- Alternate Answering
- Alternate Answering/Customer Control Option
- Message Waiting Tone
- Easy Call

- Special Delivery Feature
- Multi Call Forwarding
- Remote Call Forwarding
- Direct Connect

86. Other line-side port types also include access to all features applicable to that port type. The requesting carrier can seek, on an optional basis, access to functions, features capabilities and features that the switch involved is capable of providing, but which are not currently offered by Ameritech Michigan, through the BFR Process. See, e.g., AT&T Agreement, Sch. 9.5.(4.1.4).

87. Upon request, Ameritech Michigan will provide unbundled local switching using any technically feasible custom and special routing by class-of-call (e.g., local, toll, operator services, directory, 911, etc.) by switching custom routed calls by call type to trunks designated by the requesting carrier. See, e.g., AT&T Agreement, Sch. 9.5(4.1.5, 4.1.7). I will discuss special and custom routing by class-of-call later in conjunction with offering rebranding of operator services and directory assistance.

88. **Tandem Switching**. As with local switching, Ameritech Michigan offers access to tandem switching unbundled from loops, transport and other services. The unbundled tandem switching network element provides requesting telecommunications carriers with access to all available basic tandem switching functions. See, e.g., AT&T Agreement,

Sch. 9.2.3(2.4). Basic capabilities that are centralized in the tandem switch that are not in the end office switches, and that Ameritech Michigan makes available to its end-user customers, include, but are not limited to:

- Routing of calls from an inbound trunk to an outbound trunk based on destination digits.
- Routing of Equal Access or Operator Service calls from an inbound trunk to an outbound trunk based on the CIC (Carrier Identification Code) forwarded by the inbound trunk.

89. Ameritech Michigan's unbundled tandem switching service meets all requirements of the FCC's Rules. See 47 C.F.R. § 51.319(c)(2). Unbundled tandem switching provides trunk-connect facilities, including, but not limited to, the connection between trunk termination at a cross-connect panel and a switch trunk card. See, e.g., AT&T Agreement, Sch. 9.2.3(2.1). The tandem switching network element also performs all tandem basic switching functions of connecting trunks to trunks, including trunks of the requesting carrier. Ameritech Michigan also connects a requesting carrier's tandem switching ports with those of other telecommunications carriers, interexchange carriers, Ameritech Michigan and an incumbent LEC. See, e.g., AT&T Agreement, Sch. 9.2.3(2.1). Unbundled tandem switching further provides access to any functions that are centralized in the tandem switches, including call recording, the routing of calls to operator services, and signaling conversion features. See, e.g., AT&T Agreement, Sch. 9.2.3(2.4).

VII. CHECKLIST ITEM (vii): 911/E911; DIRECTORY ASSISTANCE; AND OPERATOR CALL COMPLETION

A. 911/E911

90. Checklist Item (vii) requires that Ameritech Michigan provide "[n]ondiscriminatory access to . . . 911 and E911 Services." 47 U.S.C. § 271(c)(2)(B)(vii)(1). Ameritech Michigan meets this requirement.

91. Ameritech Michigan will provide to the customers of competitive local exchange carriers access to the type of 911 service selected by the municipality in which they reside in a manner identical to the 911 service supplied to its own customers. See, e.g., AT&T Agreement, § 3.11. Compliance will be measurable and readily verifiable by competing carriers pursuant to a well defined operational plan. Ameritech Michigan has already demonstrated compliance with this requirement by furnishing access to 911 and E911 to several competitive carriers, including MFS, Brooks Fiber, MCI Metro, TCG, and WinStar Wireless.

92. Ameritech Michigan's E911 network forwards the end-user caller's telephone number or central office identification code to the appropriate primary Public Safety Answering Point ("PSAP") or designated alternative locations on 911 calls. With E911, the end user's telephone number is displayed at the PSAP and also used to retrieve the corresponding end-user

name and address for display at the 911 call-taker's position at the PSAP.

93. Under the E911 arrangement, Ameritech Michigan will provide requesting telecommunications carriers access to its 911 services. Ameritech Michigan will provide trunking from the requesting telecommunications carrier's collocation point to the E911 control office (Selective Router). Ameritech Michigan will also assist a requesting telecommunications carrier in designing and sizing its interconnection to Ameritech Michigan's control office.

94. Ameritech Michigan's offering of 911 and E911 services is outlined in the AT&T Agreement (§ 3.11, Sch. 3.11) and the Brooks Fiber Agreement (§ 18.0(a)).

B.   **Directory Assistance and Operator Call Completion**

95. Ameritech Michigan will provide nondiscriminatory access to operator and directory assistance services ("OS/DA") in several different ways, as required by the Checklist, the FCC's Order, Second Report and Order, and its Rules. In addition, Ameritech Michigan will provide OS and DA as unbundled network elements pursuant to 47 C.F.R. § 51.319(g).

96. **Standard OS/DA.** Ameritech Michigan provides access to its standard OS and DA in conjunction with telephone exchange service it provides to resellers, and to requesting

telecommunications carriers receiving unbundled local switching. See, e.g., AT&T Agreement, Sch. 9.5(8.0). The OS and DA functions provided in each case are identical to what Ameritech Michigan provides to its end user customers. 47 C.F.R. § 51.217(a)(2). See, e.g., AT&T Agreement, Sch. 9.5(8.12). The access arrangements to OS and DA enable requesting telecommunication carriers and resellers to offer their subscribers the ability to gain access to Ameritech Michigan's OS or DA by dialing the prevailing dialing arrangement to local directory assistance or operator services (e.g., 0, 00, 411, 555-XXXX) with no unreasonable dialing delay. 47 C.F.R. § 51.217(c)(2).

97. **Unbundled OS or DA.** Requesting telecommunications carriers can request that Ameritech Michigan provide OS and/or DA unbundled from Ameritech Michigan's telephone exchange and unbundled local switching services, or from any other service or facility of Ameritech Michigan. Such unbundling of OS or DA can be used by the requesting carrier to provide OS and/or DA to its local exchange customers. Requesting carriers ordering unbundled OS/DA deliver their traffic to Ameritech Michigan's OS or DA on separate trunks that the requesting carrier either provides itself or obtains from Ameritech Michigan or another source. See, e.g., AT&T Agreement, Sch. 9.5(8.9).

98. **Unbundled Access to OS or DA Databases.** Upon request, and as technically feasible, Ameritech Michigan will provide unbundled access to the databases it uses to provide OS or DA, for purposes of enabling a requesting telecommunications carrier to provide its own OS and/or DA. _See_, e.g., AT&T Agreement, Sch. 9.5(8.10). As required by 47 C.F.R. § 51.217(c)(3)(ii), unbundled access to Ameritech Michigan's OS or DA databases is provided, as is technically feasible, on an equal-in-quality basis based upon the facilities, equipment and software involved. _Id_. Unbundled access to Ameritech Michigan's databases is requested through the BFR Process. _Id_.

99. Ameritech Michigan also will provide access to adjunct OS or DA features (_e.g._, rating tables or customer information databases) necessary to allow competing providers full use of OS/DA services. 47 C.F.R. § 51.217(d).

100. The specific Operator Services offered by Ameritech Michigan include:

> (1) Manual Call Assistance, meaning manual call processing with operator involvement for calling card calls, collect calls, third number billed calls, operator assistance (_e.g._, call completion and emergency calls); Operator Transfer Service (dialing 0 and requesting connection to an interexchange carrier); Busy Line Verification (BLV) and Interrupt (BLVI) services (at the user's request, the operator verifying that line is busy or to interrupt a connection that is in progress);

(2) Automated Call Assistance, that is, mechanized call processing for automated calling card services and automated alternate billing services;

(3) Line Information Data (LIDB) Validation, which allows mechanized queries to an LIDB for call validation of alternately billed calls;

(4) Database Access, which, upon request and where technically feasible, provides electronic access to Ameritech Michigan's OS databases to enable a requesting carrier to provide its own OS; and

(5) Optional Features, such as certain types of branding, upon request and as technically feasible.

See, e.g., AT&T Agreement, Sch. 9.2.7.

101. Directory Assistance features offered by Ameritech Michigan include:

(1) Directory Assistance, which allows requesting carrier's end users to dial digits designated by the telecommunication carrier to obtain listed telephone numbers of and information regarding other subscribers;

(2) Branding, which is the ability to put messages on the front end of a DA call that is directly trunked to Ameritech Michigan's switch; and

(3) Information Call Completion, which, where facilities permit, will give end users who have received a number from an Audio Response Unit the option of completing the call by pressing a specific digit on a touch tone telephone where the requesting telecommunications carrier direct trunks its DA calls to Ameritech Michigan.

See, e.g., AT&T Agreement, Sch. 9.2.7.

102. **Optional Rebranding**. Upon request and as technically feasible, Ameritech Michigan will rebrand or unbrand OS or DA in conjunction with resold telephone exchange or unbundled local switching service with the name of the reseller or

requesting carrier. 47 C.F.R. § 51.217(d). Such optional rebranding is performed at the front end of the call on a mechanized basis using a short recorded announcement provided by the reseller or requesting carrier. However, rebranding requires that the OS or DA traffic involved be routed to Ameritech Michigan's OS or DA platform on separate trunks from Ameritech Michigan's own traffic, so that Ameritech Michigan can identify the traffic as belonging to the reseller or requesting carrier, and brand it accordingly. OS/DA traffic requires special or custom routing, which Ameritech will provide as technically feasible.

103. Ameritech Michigan's switches are designed to route end user calls to Ameritech Michigan's OS or DA platforms over shared trunks. Any other routing of these calls is considered "selective or custom" routing. Thus, in order for Ameritech Michigan to perform optional rebranding, the reseller or requesting carrier must arrange to have its OS or DA traffic delivered to Ameritech Michigan's office on separate dedicated or shared trunks, through selective or custom routing. _See_, e.g., AT&T Agreement, Sch. 9.5(8.15).

104. Special and custom routing is provided, to the extent technically feasible in the switch involved at the time, based upon development of new specified line class codes which route traffic from all lines or line ports of that class in a specific switch to a designated trunk-side trunk

group by class of call (e.g., toll, local, operator, directory assistance, 911). Separate line class codes must be developed for each switch involved and for each class of line or line port for which different routing is requested since each switch has its own unique configuration. It is generally feasible to develop, install and maintain a limited number of telecommunications line class codes per switch for a reseller or requesting carrier, but severe technical, capacity, administrative and financial problems may arise if significant numbers of new line class codes are requested in a particular switch.

105. Based on Ameritech Michigan's initial analysis, various hardware and software capacity limitations and other issues would be created by attempting to implement numerous line class codes for many different resellers across the full range of resold services. Supporting these arrangements would necessitate a significant increase in network and switch administration in order to ensure quality of services to resellers as well as the integrity of the switch. The implementation procedures that would be required in the switch in order to achieve compliance with these requirements have not been included in the current technology.

106. For some switches, Ameritech Michigan can solve a capacity problem by adding more capacity, but that solution is extremely expensive and not available for all switches.

Switches are designed and engineered for specific thresholds in various hardware, software, processing, and memory components. The assumptions made by the switch vendors during their design include a reasonable "not expected to exceed" value for such items as digit interpreter tables, screening tables, classes of service, etc. In spite of these allowances, thresholds are occasionally reached and Ameritech Michigan must pay switch vendors to redesign the switches to accommodate additional resources. The implementation of unbundled OS or DA through the use of line class codes that require development of numerous line class codes could require costly vendor support.

107. Ameritech Michigan's offer to provide OS/DA selective routing and rebranding is consistent with the Act and Rules. The Order requires customized routing and unbundling of OS/DA calls "to the extent technically feasible" (Order, ¶ 536). The Rules § 51.217(d) further creates a rebuttable presumption that a refusal to rebrand or unbrand unlawfully restricts access to OS/DA. In cases where Ameritech Michigan cannot provide requested rebranding or unbranding it will be prepared to rebut this presumption by showing that it lacks the technical capacity to provide it. Ameritech Michigan has agreed to provide custom and special routing, to the extent technically feasible, and to add capacity, as technically feasible, to respond to a firm request. However, Ameritech Michigan has also adopted an aggressive plan to make such a

solution technically feasible and to determine where the capacity exists to provide the service.

108. As required by 47 CFR § 51.217(e)(1) and (2), Ameritech Michigan will not refuse to provide rebranding or the associated selective or custom routing because of "factors within its control."

VIII.   CHECKLIST ITEM (viii):   WHITE PAGES LISTINGS

109. Section 271(c)(2)(B)(viii) requires BOCs to provide "White Pages directory listings for customers of the other carrier's telephone exchange service." Ameritech Michigan satisfies this requirement by ensuring that its directory publishing affiliate "will publish the Primary Listing of [Requesting Carrier] Customers located within the geographic scope of Publisher's directories at no charge." See, e.g., AT&T Agreement, § 15.1.1. These listings will be interfiled with listings of Ameritech Michigan customers and Ameritech Michigan will provide a copy of the requesting carrier's customer listings in a mutually agreed-upon form and format to the requesting carrier prior to publication. Ameritech Michigan or its publisher may impose a charge for changes to listings previously provided by a requesting carrier. See, e.g., AT&T Agreement, § 15.2.1. Ameritech Michigan will also license its white pages listing on a current basis to competing carriers for use in publishing directories.

110. Ameritech Michigan is currently furnishing White Pages listings to Brooks Fiber, MCI Metro, TCG, and MFS.

IX. CHECKLIST ITEM (ix): NUMBERING ADMINISTRATION

111. Checklist Item (ix) requires that Ameritech Michigan provide, "[u]ntil the date by which telecommunications numbering administration guidelines, plan, or rules are established, nondiscriminatory access to telephone numbers for assignment to the other carrier's telephone exchange service customers." 47 U.S.C. § 271(c)(2)(B)(ix). The Rules (§ 51.217(e)(i)) require that a LEC permit competing providers to have access telephone numbers that is identical to the access the LEC provides itself. Ameritech Michigan meets this requirement.

112. Ameritech Michigan provides such nondiscriminatory access to telephone numbers for assignment to other carriers' telephone exchange service customers. Until new numbering administration guidelines, plans or rules are established, Ameritech Michigan will continue to assign central office codes under existing industry guidelines and regulatory rules. 47 C.F.R. §51.217(a)(2). In the meantime, Ameritech Michigan continues to support efforts to transfer its number administration responsibilities to a neutral third party.

113. The process for obtaining an NXX number assignment is identical for Ameritech Michigan and all requesting carriers and is relatively simple. First, the code applicant makes a

request to Ameritech Michigan Code Administrator using the Central Office Code Assignment Request and Confirmation Form. The Administrator will date stamp the request and then determine if the request is in compliance with the national code assignment guidelines. If it is, then the Administrator will select an unassigned code for assignment; Ameritech Michigan will honor requests for specific numbers if available. The Administrator normally will respond to the applicant within 10 working days from receipt of the application with the assignment. Applications will be denied based upon the nondiscriminatory criteria as authorized in the guidelines and orders of the FCC, and where a request is denied, the Administrator will provide specific reasons for the denial, and information on where to appeal the decision. When the NXX code is assigned, Ameritech or the applicant will input the NPA, NXX and other relevant data into the Routing Data Base System ("RDBS") in order to ensure that the public is aware that the new code is open. Since September 30, 1994, Ameritech Michigan has used this process to assign 112 NXXs to new local exchange providers.

114. Ameritech Michigan is currently providing MFS, Brooks Fiber, TCG, MCI Metro, and other carriers with nondiscriminatory access to numbers.

X. CHECKLIST ITEM (x): ACCESS TO CALL-RELATED DATABASES AND SIGNALING LINKS

115. Both the Act (§ 271(c)(2)(B)(x)) and Rules (§ 51.319(e)) require incumbent LECs to unbundle and provide nondiscriminatory access to signaling networks and call-related databases. Ameritech Michigan's interconnection agreements provide for nondiscriminatory access to the signaling networks and call-related databases used for call routing and completion upon request. See, e.g., AT&T Agreement, Schs. 9.2.7, 9.5(6.1, 6.2).

116. **Signaling Networks.** Ameritech Michigan offers nondiscriminatory access to its signaling links and Signal Transfer Points, or "STPs", on an unbundled basis. 47 C.F.R. §51.319(e)(1)(i). See, e.g., AT&T Agreement, Sch. 9.2.5(1.0). These arrangements permit requesting telecommunications carriers to use Ameritech Michigan's SS7 signaling network for signaling between their switches, between their switches and Ameritech Michigan's switches, and between their switches and the networks of other parties connected to Ameritech Michigan's SS7 network. See, e.g., AT&T Agreement, Sch. 9.2.5(1.0). In all cases, access to Ameritech Michigan's SS7 network is provided via a signaling link between other parties' switches and an Ameritech Michigan STP in the same manner as Ameritech Michigan itself gains comparable access, or in any other technically feasible manner requested by the requesting carrier through the BFR

Process. 47 C.F.R. § 51.319(e)(1)(ii)-(iv). See, e.g., AT&T Agreement, Schs. 9.2.5(1.2), 9.5(6.1).

117. **Call-related databases.** Call-related databases are databases other than those used to provide OSS functions used in signaling networks for the transmission, routing, billing and collection, or other aspects of providing a telecommunications service. These databases include all the call-related databases identified by the FCC in its Rules (47 C.F.R. § 51.319(e)(2)(ii)). Call-related databases being offered by Ameritech Michigan are the Line Information Database (LIDB) (See, e.g., AT&T Agreement, Sch. 9.2.5(2.2)), the Toll Free Calling (800) database (See, e.g., AT&T Agreement, Sch. 9.2.5(2.1)), and Advanced Intelligent Network (AIN) databases used for call routing and completion. See, e.g., AT&T Agreement, Sch. 9.2.5(2.5)). When long-term number portability is deployed, Ameritech Michigan will offer unbundled access to its long-term number portability downstream databases. Id., Sch. 9.2.5(2.4). Ameritech Michigan also provides access to the CNDS database for Caller ID service. Id., Sch. 9.2.5(2.3).

118. Under Ameritech Michigan's agreements, requesting telecommunications carriers may obtain access to these databases via Ameritech Michigan's out-of-band SS7 signaling network in the same manner as Ameritech Michigan obtains such

access or in any other technically feasible manner. <u>See</u>, e.g., AT&T Agreement, Sch. 9.5(6.2.2)

119. Ameritech Michigan will allow any requesting carrier that purchases local switching capability to use Ameritech Michigan's service control point ("SCP") in the same manner, and via the same signaling links, as Ameritech Michigan. 47 C.F.R. § 51.319(e)(2)(iii). <u>See</u>, e.g., AT&T Agreement, Schedule 9.5 (6.2.2).

120. When a requesting carrier deploys its own switch linked to Ameritech Michigan's signaling system, the carrier may obtain access to Ameritech Michigan's SCP in a manner enabling the carrier to provide any call-related, database-supported services to customers using its switch. 47 C.F.R. § 51.319(e)(2)(iv). <u>See</u>, e.g., AT&T Agreement, Schedule 9.5 (6.2.2).

121. Ameritech Michigan provides access to its call-related databases in a manner that complies with §222 of the Act. 47 C.F.R. § 51.319(e)(2)(vi). <u>See</u>, e.g., AT&T Agreement, Schedule 9.5 (6.2.2).

122. Ameritech Michigan currently furnishes Brooks Fiber, TCG, and MFS with unbundled access to both the 800 and LIDB databases.